

VIA UPS

Eric F. Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-05-05A
Final Remedial Alternatives Memorandum

Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated March 10, 2011. With this letter, the EPA approves the Remedial Alternatives Memorandum (Memo). The following remedial alternative related issues shall be included in the Feasibility Study Report, as follows:

1. (Section 4.0, p. 26): The Memo includes annual groundwater monitoring to confirm continued plume stability or to verify the effectiveness of groundwater hydraulic control under Alternative 2 or Alternative 3. The Feasibility Study shall expand on this by including the criteria by which plume stability, or effectiveness of hydraulic control, will be determined, and what actions will be triggered if those criteria are exceeded. For example, action levels, number and schedule of samples to confirm results, etc., shall be proposed in the Feasibility Study, as well as the proposed actions should the criteria be exceeded.
2. (Table 2, p. 8 of 10): The Memo retains discharge to a publically owned treatment works (POTW) as part of Alternative 3. Discharge to the Intracoastal Waterway shall also be retained in the Feasibility Study as an alternative in case discharge to the POTW should prove not feasible for some reason.

The Memo included the current institutional controls (restrictive covenants) in Appendix B of the Memo. While the final remedy for the site will be determined in the Record of Decision for the site, it is appropriate to note that acceptable institutional controls should include the location of the remaining contamination (metes and bounds) and a list of the contaminants present.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller, P.E.
Remedial Project Manager

cc: Luda Voskov (TCEQ)

millers: 3/22/11: L:\Superfund\oversight\gulfco remedial alternatives memo approval with comments 3-22-2011

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